REMARKS

Independent claims 1 and 7 have been amended to further define the invention. Support is found in the specification and drawings.

Support being fully provided for all the above amending, this amending does not constitute the addition of new matter and entry is urged.

Claims 1-12 stand finally rejected under 35 U.S.C. 103(a) as being unpatentable over JP 11-107,212. Applicants respectfully traverse this rejection and request reconsideration of the final rejection.

Regarding the rejection of independent structure claims 1 and 7, as stated by the Examiner, JP 11-107,212 does not teach the claimed fiber spacing in the woven sheet. The Examiner alleges that JP 11-107,212 does teach optimizing the weave density of the fabric in order to reduce variation in molding time and dimension and therefore, one of ordinary skill in the art would have been motivated to have optimized the weave density, and inherently, the spacing between the fibers, in order to enhance the efficiency of the process which employ the glass cloth by reducing variations in molding time and dimension. The Applicant's closed weave mesh of amended independent structure claims 1 and 7 provides a significant advantage over JP 11-107,212. As described on page 9, lines 7-10 and Figure 6, the closed woven mesh of the Applicant's invention of amended independent structure claims 1 and 7 supports pad 14 from collapse during a wire bonding process. Furthermore, as described on page 9, lines 17-20, the closed woven mesh can accommodate wirebonding with wire thicknesses as low as 0.2 mils without circuit device deformation. Circuit deformation can lead to crack damage to the circuit device and to the insulating layers of the substrate during wire bond processing. This will result in yield loss and more expensive manufacturing operations. The closed woven mesh of Applicant's invention of amended independent structure claims 1 and 7 substantially prevents

deformation of the circuit device during the process of wire bonding and reduces yield loss due to cracking of the circuit device and/or the substrate. The advantage of the invention of JP 11-107,212 is that it reduces variation of dimension and molding time dispersion of a printed circuit board enabling accurate positioning of components in standard holes. There is no teaching or suggestion in JP 11-107,212 for the reduction in variation dimension or molding time dispersion to substantially prevent deformation of a circuit device during a wire bond process. The Examiners conclusion that one of ordinary skill in the art would have been motivated to have optimized the weave density and inherently the spacing between fibers of JP 11-107,212 to enhance the efficiency of the processes which employ the glass cloth to arrive at Applicant's invention of amended independent structure claim 1 and 7 is not supported by evidence and no rational is given to support this conclusion. Applicants direct the Examiner to MPEP § 2112 which states that to make a 35 U.S.C. 103(a) rejection based on inherency the "EXAMINER MUST PROVIDE A RATIONAL OR EVIDENCE TENDING TO SHOW INHERENCY". MPEP § 2112 goes on to state that "In relying upon the theory of inherency, the examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art". Ex parte Levy, 17 USPQ2d 1461, 1464 (Bd. Pat. App. & Inter. 1990). In view of no such teaching or suggestion in JP 11-107,212 and also because JP 11-107,212 does not teach or suggest substantially preventing deformation of a circuit device during a wire bonding process as taught by Applicants, a rejection under 35 U.S.C. 103(a) is improper and withdrawal of the rejection of amended independent structure claims 1 and 7 is urged. Claims 2-6, and 8-12 depend directly from amended claims 1 and 7, respectively, and thus from subject matter deemed patentable. These claims are similarly viewed. Withdrawal of the 35 U.S.C. 103(a) rejection of these claims is also urged.

The Application is deemed in condition for allowance and such action on the part of the Examiner is respectfully requested. Should the Examiner believe, however, that minor differences remain which, if overcome, would result in allowance of the Application and that

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said differences can be openly discussed in a phone conversation, the Examiner is cordially requested to phone the undersigned, collect, at the number provided below, for the purpose of discussing these differences and hopefully obtaining allowance of the Application.

Respectfully submitted,

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